

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA.

CASE NO: 00-6309-~~CF~~-SEITZ

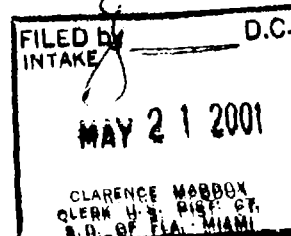
UNITED STATES OF AMERICA,

Plaintiff,

-VS-

JULIUS BRUCE CHIOUSANO,

Defendant.



MOTION FOR PERMISSION TO TRAVEL

COMES NOW, the Defendant, JULIUS BRUCE CHIOUSANO, by and through undersigned counsel and pursuant to the Federal Rules of Criminal Procedure, and respectfully requests this Honorable Court enter an Order permitting the Defendant to leave the State of Florida and travel to San Juan, Puerto Rico, and as grounds, would show unto the Court the following;

1. That the Defendant, JULIUS BRUCE CHIOUSANO, is presently released on a one hundred thousand dollar corporate surety bond with supervised release.
2. That the Defendant is also released on bond on a one hundred thousand dollar corporate surety bond in Case No. 00-6273-Cr-Huck.
3. That the Defendant has been on supervised release since October 5, 2000.
4. That the Defendant respectfully requests this Honorable Court permit the Defendant to travel to San Juan, Puerto Rico, for the purpose of Memorial Day Holiday.
5. That the Defendant desires to travel outside of the State of Florida for approximately Five (5) days beginning on or about May 31, 2001 and returning June 4, 2001.
6. That a copy of the Defendant's Itinerary is attached hereto as Defendant's Exhibit 1.
7. That undersigned has spoken to the Pretrial Services officer, Raul Sagaro, regarding this travel permit and he has no objection.
8. That prior to the Defendant's departure the Defendant will provide addresses and telephone numbers where he will be staying to Raul Sagaro of the Pretrial Services Office in Dade

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County, Florida, as required under Defendant's terms and conditions of supervised release and report immediately upon his return to the jurisdiction.

WHEREFORE, by reason of the foregoing, the Defendant, JULIUS BRUCE CHIUSANO, respectfully requests this Honorable Court enter an Order granting the Defendant's request permitting the Defendant to travel outside the State of Florida and to San Juan, Puerto Rico.

10-G CERTIFICATE

That undersigned counsel, pursuant to Local Rule 10(G)(1) certifies that he has contacted the opposing counsel, Assistant United States Attorney, Brian McCormick, of the Southern District of Florida in an effort of good faith to resolve by agreement the subject matter and he states that he has no objection to the granting of this motion.

I HEREBY CERTIFY that a copy of the foregoing has been furnished to Brian McCormick, Assistant United States Attorney, United States Attorney's Office, 299 East Broward Boulevard, Fort Lauderdale, FL 33301, by Facsimile (954-356-7230) and Raul Sagaro, Pretrial Services, 330 Biscayne Blvd., Suite 500, Miami, FL 33132, by Facsimile 305-530-7123, and by U.S. Mail, and the original hereof filed with the Clerk of the Court, by Hand Delivery, this 21st MAY, 2001.

Respectfully submitted,

DONALD R. SPADARO, P.A.
Attorneys for DEFENDANT/CHIUSANO
1000 South Federal Highway
Suite 103
Fort Lauderdale, Florida 33316
Telephone: (954) 763-5504

By: 

DONALD R. SPADARO, ESQUIRE
Florida Bar No. 320341

TO 610-567-5811

FROM 49591455 49591455 10MAY01 1149EST 21621609 PAGE 1 OF 1

EASYLINK 2162160S001 10MAY01 11:49/11:49 EST
FROM: 49591455 49591455 ISLA UD
ISLAND RESORT TOURS
TO: 6105675811

SALES PERSON: JK
CUSTOMER NBR: 020074

ITINERARY
VTXYUQ

DATE: 10 MAY 01
PAGE: 01

TO: ISLAND RESORT TOURS
300 EAST 40TH ST
NEW YORK, NY 10016-2188

FOR: CHIUSANO/BRUCE

31 MAY 01 - THURSDAY

AIR	TWA	FLT:952	BUSINESS	LUNCH
	LV MIAMI INTERNTNL		1045A	EQP: MD-80
				02HR 26MIN
	AR SAN JUAN	PR	111P	NON-STOP
	ARRIVE: TERMINAL C			REF: 2E25RX

04 JUN 01 - MONDAY

AIR	TWA	FLT:955	BUSINESS	DINNER
	LV SAN JUAN	PR	605P	EQP: MD-80
	DEPART: TERMINAL C			02HR 44MIN
	AR MIAMI INTERNTNL		049P	NON-STOP
				REF: 2E25RX

THIS IS NOT A BOARDING PASS. YOU MUST CHECK-IN AT THE
AIRLINE TICKET COUNTER. PLEASE RECONFIRM FLIGHTS WITH
THE AIRLINE 48 HOURS PRIOR TO DEPARTURE